

DOA
03-12-19**UNITED STATES DISTRICT COURT****DISTRICT OF ARIZONA**

UNITED STATES OF AMERICA

V.

Elizabeth A. Ainslie

CRIMINAL COMPLAINT

CASE NUMBER: 19-9090 MJ

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

On or about the dates described in Attachment A in the County of Maricopa in the District of Arizona, the defendant violated, 18 U.S.C. §§ 2113(a), an offense described as follows:

See Attachment A – Description of Counts

I further state that I am a Special Agent from the Federal Bureau of Investigation and that this complaint is based on the following facts:

See Attachment B – Statement of Probable Cause Incorporated By Reference Herein.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

AUTHORIZED BY: Robert Brooks, AUSA

Paul J. Lee, FBI Special Agent

Name of Complainant


Signature of Complainant

Sworn to before me and subscribed in my presence

March 13, 2019

Date

at Phoenix, Arizona

City and State

HONORABLE Eileen S. Willett

United States Magistrate Judge

Name & Title of Judicial Officer


Signature of Judicial Officer

ATTACHMENT A
DESCRIPTION OF COUNTS

Count 1

On or about August 4, 2018, in the District of Arizona, defendant Elizabeth Ainslie, by force, violence, and intimidation, did take from the person and presence of a bank teller, money belonging to and in the care, custody, control, management, and possession of, Chase Bank, 2950 West Peoria Avenue, Phoenix, AZ, the deposits of which were then federally insured by the Federal Deposit Insurance Corporation (FDIC) in violation of Title 18 U.S.C. § 2113(a).

Count 2

On or about September 10, 2018, in the District of Arizona, defendant Elizabeth Ainslie, by force, violence, and intimidation, did attempt take from the person and presence of a bank teller, money belonging to and in the care, custody, control, management, and possession of, Wells Fargo Bank, 1901 S Gilbert Road, Mesa, AZ, the deposits of which were then federally insured by the Federal Deposit Insurance Corporation (FDIC) in violation of Title 18 U.S.C. § 2113(a).

Count 3

On or about November 14, 2018, in the District of Arizona, defendant Elizabeth Ainslie, by force, violence, and intimidation, did attempt to take from the person and presence of a bank teller, money belonging to and in the care, custody, control, management, and possession of, Chase Bank, 4714 S Rural Road, Tempe, AZ, the deposits of which were then federally insured by the Federal Deposit Insurance Corporation (FDIC) in violation of Title 18 U.S.C. § 2113(a).

Count 4

On or about November 24, 2018, in the District of Arizona, defendant Elizabeth Ainslie, by force, violence, and intimidation, did take from the person and presence of a bank teller, money belonging to and in the care, custody, control, management, and possession of, Chase Bank, 2950 West Peoria Avenue, Phoenix, AZ, the deposits of which were then federally insured by the Federal Deposit Insurance Corporation (FDIC) in violation of Title 18 U.S.C. § 2113(a).

Count 5

On or about December 18, 2018, in the District of Arizona, defendant Elizabeth Ainslie, by force, violence, and intimidation, did take from the person and presence of a bank teller, money belonging to and in the care, custody, control, management, and possession of, Chase Bank, 4250 W Thunderbird Road, Phoenix, AZ, the deposits of which were then federally insured by the Federal Deposit Insurance Corporation (FDIC) in violation of Title 18 U.S.C. § 2113(a).

Attachment B

Statement of Probable Cause

Your Affiant, Paul J. Lee, being duly sworn, deposes and says to wit:

I am a Special Agent with the Federal Bureau of Investigations (FBI) in Phoenix, Arizona. I have been appointed a Special Agent with the FBI since September of 2008. I have extensive experience with violent crimes and national security investigations, including, but not limited to, serial robbery cases, terrorism cases, search warrants, physical surveillance, evidence collection, and arrests.

I am seeking an arrest warrant for Elizabeth Ann Ainslie for a violation of Title 18 U.S.C. 2113(a) (Bank Robbery). I am not including every detail known to me or other law enforcement; rather, an overview and all the relevant facts to establish probable cause.

In August of 2018, the FBI became aware of, and involved in investigating, an unidentified female bank robber. Investigators believe the same individual has engaged in at least five bank robberies occurring at various commercial banks between August 4, 2018 and December 18, 2018. Each robbery is listed and described below.

Robbery #1: On August 4, 2018, at approximately 10:13 a.m., an unknown female suspect committed bank robbery at a Chase Bank, located at 2950 West Peoria Avenue, Phoenix, Arizona. After entering the store, the robber stood in line and approached the teller line. The robber stated she wanted to make a withdrawal and produced the demand note. The robber fled the business after obtaining approximately \$3,050 in cash, dropping

an additional \$200 at the teller counter. The robber was described as: a white female; late 40's in age; thin build; wearing a black wig under a khaki hat; dark sunglasses; a black short sleeved shirt; and a dark purse. This incident was documented under FBI case number 91A-PX-2966379.



Robbery #2: On September 10, 2018, at approximately 3:40 p.m., an unknown female suspect committed attempted bank robbery at a Wells Fargo Bank, located at 1901 South Gilbert Road, Mesa, Arizona. After entering the store, the robber stood in line and approached the teller line. The robber did not say anything and produced the demand note. The robber fled the business after obtaining no money. The robber was described as: a white female; 45 years old or older; 5'4" tall; wearing a white baseball hat; dark sunglasses;

hair in a ponytail; a black tank top shirt; white long pants; white shoes; and a dark purse.

This incident was documented under FBI case number 91A-PX-2966379.





Robbery #3: On November 14, 2018, at approximately 11:50 a.m., an unknown female suspect committed attempted bank robbery at a Chase Bank, located at 4714 South Rural Road, Tempe, Arizona. After entering the store, the robber stood in line and approached the teller line. The robber told the teller that she was there to cash a check and produced the demand note. The robber fled the business after obtaining no money. The robber was described as: a white female; 50-60 years old; 5'5" tall; 120-140 lbs; wearing a baseball hat; dark sunglasses; hair in a ponytail; white sweater; dark long pants; white

shoes; and a light purse. This incident was documented under FBI case number 91A-PX-3018624.



Robbery #4: On November 24, 2018, at approximately 10:18 a.m., an unknown female suspect committed bank robbery at a Chase Bank, located at 2950 West Peoria Avenue, Phoenix, Arizona. After entering the store, the robber stood in line and approached the teller line. The robber told the teller that she was having a garage sale and needed notes in the denomination of \$5, \$10, \$20, \$50, and \$100 and produced the demand note. The demand note stated that the robber had a gun. The robber fled the business after obtaining approximately \$1000 in cash. The robber was described as: a white female; 50-60 years old; 5'5" tall; 120 lbs; wearing a black knit cap; dark sunglasses; dark sweater jacket; gray t-shirt; long jeans; and white and gray athletic shoes.



Robbery #5: On December 18, 2018, at approximately 10:18 a.m., an unknown female suspect committed bank robbery at a Chase Bank, located at 4250 West Thunderbird Road, Phoenix, Arizona. After entering the store, the robber stood in line and approached the teller line. The robber told the teller that she was making a withdrawal and produced the demand note. The demand note stated that the robber had a gun. The robber fled the business after obtaining approximately \$400 in cash. The robber was described as: a white female; 45-50 years old; 5'1" – 5'2" tall; 120 lbs; wearing a white knit cap with pom on top, Denver Broncos wording; dark sunglasses; light gray sweater; long faded blue jeans; and white and gray athletic shoes.



INVESTIGATION

In December 2018, the FBI was made aware, by way of a tip, that ELIZABETH AINSLIE was likely responsible for the robberies. AINSLIE had been convicted of bank robbery in 2009.

After reviewing the Arizona MVD information pertaining to AINSLIE's physical description and photo, your affiant, based on my training and experience, believes that AINSLIE's physical appearance, to include height, weight, and facial features, are similar to those described by witnesses and depicted in surveillance images of the above referenced bank robbery suspect.

A publicly available Facebook page was located on December 27, 2018 with the web address of www.facebook.com/elizabeth.ainslie1 (Facebook User ID 100001669118510). A review of the publicly viewable portion of that profile page

revealed additional information. A group photograph with AINSLIE is shown where the photograph of AINSLIE bears striking resemblance to that of the robbery still photographs.

In February 2019, a search warrant for collection of DNA, fingerprints, and photographs was obtained to be served on AINSLIE to further the investigation and conduct photographic line ups. AINSLIE was not located in that timeframe. Later that month, another tip was provided to the FBI indicating ELIZABETH AINSLIE as a potential suspect in the bank robbery series. The tipster stated that AINSLIE was a former employee, and that time sheets suggested that she was either off of work, or nearby a robbery location at each of the robberies listed above.

In March 2019, an additional search warrant for physical characteristics was obtained after additional location information was obtained for AINSLIE.

On March 12, 2019, a search warrant for ELIZABETH AINSLIE's physical characteristics was served on AINSLIE in Phoenix, AZ. Subsequent to the service of the warrant, updated photographs of AINSLIE were taken, and a photographic line up was created. This photographic line up was shown to the victim tellers of the bank robberies referenced above. Victim Teller LM from Chase Bank 2950 W Peoria Avenue, Phoenix, AZ; Victim Teller JR from Chase Bank 4717 S Rural Road, Tempe, AZ; and Victim Teller LC from Chase Bank 4250 W Thunderbird Road, Phoenix, AZ positively identified AINSLIE as the bank robber from their respective bank robberies.

Also on March 12, 2019, I interviewed AINSLIE. Initially, AINSLIE invoked her right to counsel. Later, however, without intervention from law enforcement, AINSLE asked to again speak to law enforcement. She was read her *Miranda* rights for a second

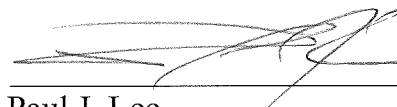
time, and waived her rights at that time. During that portion of the interview, AINSLIE confessed to the five bank robberies referenced above.

Based on the above listed facts, your Affiant believes there is probable cause to issue a complaint for ELIZABETH AINSLIE for the bank robberies of:

- Chase Bank, 2950 W Peoria Avenue, Phoenix, AZ (8/4/18)
- Wells Fargo Bank, 1901 S Gilbert Road, Mesa, AZ (9/10/18)
- Chase Bank 4714 S Rural Road, Tempe, AZ (11/14/18)
- Chase Bank, 2950 W Peoria Avenue, Phoenix, AZ (11/24/18)
- Chase Bank, 4250 W Thunderbird Road, Phoenix, AZ (12/18/19)

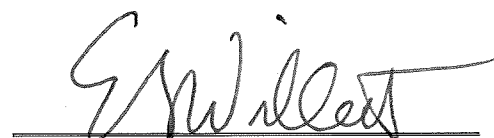
In violation of Title 18 U.S.C. 2113(a).

Dated this 13 day of March, 2019.



Paul J. Lee
Special Agent, FBI

Subscribed and sworn to and before me on this 13 day of March, 2019. I find probable cause to believe that the defendant has committed the crimes(s) set forth in this Complaint.



Honorable Eileen S. Willett
U.S. Magistrate Judge